

**EXHIBIT A**

**Baker & Hostetler LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Tracy Cole  
Fernando Bohorquez  
Ganesh Krishna  
Michelle N. Tanney

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

MAGNIFY INC., et al.,

Defendants.

Adv. Pro. No. 10-05279 (SMB)

**AMENDED CASE MANAGEMENT STIPULATION AND ORDER**

Plaintiff Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq. (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff, and Defendants Magnify, Inc. (“Magnify”), Strand International Investments Ltd. (“Strand”), Premero Investments Ltd. (“Premero”), Yair Green (“Green”), the Yeshaya Horowitz Association (“Yeshaya”), and Express Enterprises Inc. (“Express”) (the Trustee, together with the Defendants, are collectively referred to herein as the “Parties”) hereby submits the Proposed Thirteenth Amended Case Management Plan, pursuant to Federal Rules of Civil Procedure 16 and 26, as incorporated into Bankruptcy Rules 7016 and 7026, as follows:

**WHEREAS**, on September 29, 2017, the Trustee filed the Second Amended Complaint; and

**WHEREAS**, on October 30, 2017, Defendants filed a Motion to Dismiss the Trustee’s Second Amended Complaint; and

**WHEREAS**, on January 31, 2018, the Court held a hearing on Defendants’ Motion to Dismiss the Trustee’s Second Amended Complaint; and

**WHEREAS**, on April 13, 2018, the Court issued its decision Denying Defendants’ Motion to Dismiss the Trustee’s Second Amended Complaint; and

**WHEREAS**, on June 18, 2019, the Court ordered mediation of this Adversary Proceeding pursuant to General Order M-452 and Local Bankruptcy Rule 9019-1; and

**WHEREAS**, on July 11, 2019, the Court issued its Order Appointing Mr. Ted Berkowitz as Mediator; and

**WHEREAS**, the Parties engaged in mediation from September 11-12, 2019 in the U.S.,  
and previously in Israel from May 27-30, 2019; and

**WHEREAS**, in good faith, following those mediations, and over the course of several  
months, the Parties engaged in settlement negotiations in an attempt to resolve this Adversary  
Proceeding and related litigation brought by the Trustee in Israel against certain individual  
defendants; and

**WHEREAS**, the Parties have reached a settlement in principle in the U.S. and in one of  
the two actions in Israel, C.C. 18907-12-15 currently before the District Court of Tel Aviv,  
Israel; and

**WHEREAS**, the Parties now wish to amend the Twelfth Amended Case Management  
Plan, which the Court So Ordered on June 24, 2019.

**IT IS THEREFORE MUTUALLY AGREED AND STIPULATED**, by and between  
the Trustee and the Defendants, that the following provisions and deadlines are hereby made  
applicable to this adversary proceeding:

1. All upcoming deadlines outlined in the Discovery Plan of the Twelfth Amended Case Management Order are adjourned *sine die* while the Parties move forward with finalizing a settlement agreement.
2. This stipulation may be signed by the Parties in any number of counterparts, each of which shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original.

Dated: New York, New York  
November 26, 2019

BAKER & HOSTETLER LLP

By: /s/ Tracy Cole  
45 Rockefeller Plaza  
New York, New York 10111

EMMET, MARVIN & MARTIN, LLP

By: /s/ Paul T. Weinstein  
120 Broadway, 32th Floor  
New York, New York 10271

Telephone: 212.589.4200

Facsimile: 212.589.4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Tracy Cole

Email: tcole@bakerlaw.com

Fernando Bohorquez

Email: fbohorquez@bakerlaw.com

Ganesh Krishna

Email: gkrishna@bakerlaw.com

Michelle N. Tanney

Email: mtanney@bakerlaw.com

Telephone: (212) 238-3090

Facsimile: (212) 238-3100

Paul. T. Weinstein

Email: pweinstein@emmetmarvin.com

*Attorneys for Defendants*

*Magnify Inc., Premero Investments Ltd.,*

*Strand International Investments Ltd.,*

*The Yeshaya Horowitz Association, Yair Green,*

*and Express Enterprises Inc.*

*Attorneys for Plaintiff Irving H. Picard,  
Trustee for the Substantively Consolidated  
SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate  
of Bernard L. Madoff*

SO ORDERED

Dated: \_\_\_\_\_, 2019  
New York, New York

\_\_\_\_\_  
HON. STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE